

Air Pollution Control Division
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June 23, 2005

Mark Friedrichs, PI-40
Office of Policy and International Affairs
U.S. Department of Energy
Room 1E190, 1000 Independence Avenue, S.W.
Washington, DC 20585

Dear Mr. Friedrichs:

The State of Vermont is pleased to offer comments on the proposed revisions to the final General Guidelines and draft Technical Guidelines for the National Voluntary Greenhouse Gas Reporting Program, created under section 1605(b) of the Energy Policy Act of 1992. We support the Department's review of the program and appreciate the opportunity to comment on the revised guidelines.

Recognizing the importance of voluntary greenhouse gas emissions reporting, representatives from the Vermont Department of Environmental Conservation – Air Division have been participating in the development of a Regional Greenhouse Gas Registry (RGGR) since the fall of 2003. Our main objective in the RGGR process has been to design a complete, transparent, and accurate greenhouse gas reporting protocol that is as consistent as possible with international reporting standards, and follows the WRI/WBCSD *GHG Protocol*. To this end, we ask you to grant participants in other registries with reporting requirements equal to or more stringent than those of 1605(b) the same recognition and credit under future regulatory programs that may be granted to 1605(b) participants.

While we commend the administration for making numerous technical improvements to the previously circulated Guidelines, we still believe that the proposed design of 1605(b) does not go far enough to ensure that reporting of greenhouse gas emissions will be rigorous, uniform, and credible. The revised guidelines provide participants with a great amount of flexibility, and a number of the basic criticisms from previous comment periods regarding consistency and accuracy remain unaddressed.

Our primary concerns focus on the following design elements:

- Include ability to transition to a mandatory reporting program
- Revise the definition of reporting entities and create one reporting system for large and small entities
- Utilize absolute emissions indicators rather than intensity metrics for determining reductions
- Need for a clear distinction between entity-level reporting and project-level reporting
- Third party verification of all reports and quality control
- Calculation tools should be consistent with measurement and calculation methodologies used in the WRI/WBCSD *GHG Protocol*
- Need for improved transparency of the program

Thank you for the opportunity to comment on the revised guidelines. We hope that these comments will provide constructive assistance as you revise the 1605(b) reporting program.

Sincerely,

Richard A. Valentinetti, Director
Vermont Air Pollution Control Division